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10 *Attorneys for Debtors and Reorganized Debtors*

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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

14
15 **In re:**

16 **PG&E CORPORATION,**

17 **- and -**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

- 20
- 21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 * *ALL PAPERS SHALL BE FILED IN THE*
25 *LEAD CASE, NO. 19-30088 (DM)*

26 Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

27

28 **PG&E'S EVIDENTIARY OBJECTIONS IN**
OPPOSITION TO DECLARATION OF
AMIR SHAHMRZA IN SUPPORT OF
CLAIMANT'S SECOND MOTION FOR
PARTIAL SUMMARY JUDGMENT OF
ISSUES

Date: December 19, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Pursuant to the Federal Rules of Evidence, Debtors PG&E Corporation and Pacific Gas and
 2 Electric Company hereby object to the declarations and exhibits submitted in support of Claimant's
 3 Motion for Partial Summary Judgment and in Support of Debtors' Counter-Motion for Summary
 4 Judgment:

5 *Declaration of Amir Shahmirza in Support of Claimant's Second Motion for Partial Summary
 6 Judgment of Issues* [Docket No. 14007-2]

7 Paragraph 7(c), at 2:25-26 (the 8 transmission lines were movable 9 and could be relocated")	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion.
10 Paragraph 8 ("PG&E informed 11 me that it intended to "ensure the safety and reliability of the electric transmission system: through 'improvement project near your [Komir's property.'")	FRE 801, Hearsay.
13 Paragraph 13 (The Relocation of 14 the Transmission Lines caused the lines to cross the Property at a different location than the 15 Original Transmission Lines.)	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion.
16 Paragraph 14 ("The Relocation 17 of the Transmission Lines as placed on the New Transmission Towers also caused the lines to cross th Property at a 18 significantly lower height as, according to statements made by 19 PG&E representatives to me on- site, the New Transmission Lines crossed the Property at a 20 lowest height of approximately sixty-two feet (62') (the "New Transmission Line Height") 21 rather than a prior height of approximately seventy three feet (73'). A representatives of 22 PG&E also stated to me that the capacity of the Transmission Lines was increased from 23 115kV to 230kV, i.e., doubling the high voltage that would	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion; FRE 801, Hearsay.

1	cross the Property.”)	
2	Paragraphs 22 (“Komir cannot occupy the space through which PG&E placed its high voltage lines in any manner or for any purpose.”)	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 702-706, Improper Expert Opinion.
3	Paragraph 25 (“At no time dud PG&E, or any person on its behalf, pay any real property taxes assessed against the Property.”)	FRE 602, Lacks Foundation/Personal Knowledge./Speculation; FRE 801, Hearsay.

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Dated: November 3, 2023

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KELLER BENVENUTTI KIM LLP
ROVENS LAMB LLP
LAW OFFICES OF JENNIFER L. DODGE, INC.

10 By: /s/ Steven A. Lamb
11 Steven A. Lamb
12 *Attorneys for Debtors and Reorganized Debtors*

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